

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re Entresto (Sacubitril/Valsartan) Patent
Litigation

NOVARTIS PHARMACEUTICALS
CORPORATION,

Plaintiff,

v.

HETERO USA INC., HETERO LABS
LIMITED, HETERO LABS LIMITED
UNIT III, MSN PHARMACEUTICALS
INC., MSN LABORATORIES PRIVATE
LIMITED, MSN LIFE SCIENCES
PRIVATE LIMITED,

Defendants.

NOVARTIS PHARMACEUTICALS
CORPORATION,

Plaintiff,

v.

MSN PHARMACEUTICALS INC., MSN
LABORATORIES PRIVATE LIMITED,
MSN LIFE SCIENCES PRIVATE
LIMITED, GERBERA THERAPEUTICS,
INC., NANJING NORATECH
PHARMACEUTICAL CO., LIMITED,

Defendants.

C.A. No. 20-2930-RGA

C.A. No. 19-2053-RGA

C.A. No. 22-1395-RGA

STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME

WHEREAS, on August 2, 2024, Novartis filed a Motion for Preliminary Injunction

against MSN and a Motion for a Rule 62(d) Injunction Pending Appeal and Temporary Restraining Order Pending Resolution of the Motion and supporting documents under seal because these filings contained information that has been designated as confidential or highly confidential under the protective order by one or both of Novartis and MSN;

WHEREAS, the parties believe and expect that certain of MSN's responsive submissions will also be filed under seal on August 6, 2024 for the same reasons;

WHEREAS, in order to allow the parties sufficient time to review and confer with each other regarding redactions to the motions and related papers, Novartis and MSN have agreed to an extension of time for deadlines related to filing redactions;

IT IS HEREBY STIPULATED AND AGREED, by the parties, subject to the approval of the Court, that the deadline to file public, redacted versions of the following documents is extended to and including **August 20, 2024**:

1. Novartis's Motion for Preliminary Injunction against MSN, Opening Brief, Appendix Volumes 1-4, and Declarations (D.I. Nos. 1422-1431 in C.A. No. 20-md-2930);
2. Novartis's Motion for a Rule 62(d) Injunction Pending Appeal and Temporary Restraining Order Pending Resolution of this Motion, Opening Brief, Appendix, and Declaration (D.I. Nos. 1432-1435 in C.A. No. 20-md-2930);
3. MSN's Answering Brief in Opposition to Novartis's Motion for Preliminary Injunction against MSN, and supporting materials; and
4. MSN's Answering Brief in Opposition to Novartis's Motion for a Rule 62(d) Injunction Pending Appeal and Temporary Restraining Order Pending Resolution of this Motion, and supporting materials.

Dated: August 6, 2024

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*Attorneys for Defendants
MSN Pharmaceuticals Inc., MSN Laboratories.*

SO ORDERED this _____ day of _____, 2024.

UNITED STATES DISTRICT JUDGE